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12 Attorneys for Plaintiffs
13 TRAFFICSCHOOL.COM, INC. and
14 DRIVERS ED DIRECT, LLC, California companies.

15
16 UNITED STATES DISTRICT COURT
17 CENTRAL DISTRICT OF CALIFORNIA

18 TRAFFICSCHOOL.COM, INC.,
19 a California corporation; DRIVERS ED
20 DIRECT, LLC, a California limited
liability company,

21 Plaintiffs,
22
23 vs.
24

25 EDRIVER, INC., ONLINE GURU,
26 INC., FIND MY SPECIALIST, INC.,
27 and SERIOUSNET, INC., California
DOES 1 through 10,

28 Defendants.

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30 } Case No. CV 06-7561 PA (Cwx)
31 } The Honorable Percy Anderson
32 } [PROPOSED] ORDER RE:
33 } PLAINTIFFS' NOTICE AND MOTION
34 } FOR CONTEMPT AGAINST
35 } DEFENDANTS FOR VIOLATION OF
36 } THE COURT'S INJUNCTION AND
37 } FOR SANCTIONS

38 } Date: January 26, 2009
39 } Time: 1:30 p.m.
40 } Courtroom: 15

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46 4821-2818-6627.1

1 GOOD CAUSE APPEARING THEREFOR,

2 **IT IS HEREBY ORDERED** that:

3 1. Defendants are in contempt of court for violating the Court's August
4 26, 2008 Injunction;

5 2. Defendants shall reimburse Plaintiffs for their attorneys fees and costs
6 relating to policing Defendants' contempt and for having to bring a motion for
7 contempt, and shall pay Plaintiffs for the profits derived from the DMV.ORG
8 website during the period of non-compliance (i.e., from August 26, 2008 to the
9 present).

10 3. Within 10 days of this Order, Plaintiffs shall submit to the Court
11 supporting documents for their attorney's fees and costs associated with their
12 motion for contempt and Defendants shall submit documentation showing their
13 profits during the stated period and any off-sets to those profits claimed, so that the
14 Court may make a final determination as to the appropriate award of compensatory
15 sanctions to be awarded to Plaintiffs.

16 4. Defendants shall pay such attorneys' fees and costs, and profits, within
17 five days of the Court's further order.

18 5. Defendants shall come into full compliance with the Injunction within
19 10 days from this Order or be subject to a \$10,000 per day coercive sanction for
20 future non-compliance; [or in the alternative, that this Court will appoint an expert to
21 be retained to design a splash screen in conformance with the Injunction, at
22 Defendants' expense, pursuant to Fed. R. Civ. P. 70(a)].

23 **IT IS SO ORDERED.**

25 DATED: _____

26 The Honorable Percy Anderson
27 United States District Court Judge